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From: Fritz, Joanne [mailto:Joanne_Fritz@adp.com]

Sent: Monday, April 12, 2004 1:14 PM

To: 'ofccp-public@dol.gov'

Subject: Attn: Joseph DuBray, Jr. - Comment on proposed amendment to 41 CF R Part 60-1

Regarding the OFCCP's proposed definition of internet job applicant

As a Human Resources software development company, we design and sell HR information systems that assist employers with HR administration and meeting their government reporting compliance obligations.

As acknowledged in the proposal, it creates two definitions: one for positions subject to traditional recruiting/selection and another for positions subject to traditional recruiting/selection; and both traditional and electronic techniques may be used for the same position.

So for employers who use both traditional and electronic recruiting/selection methods for the same position, must they be able to associate applicants with one or both recruiting/selection methods used under the OFCCP and EEOC proposed definitions? Said another way, in addition to capturing information about an applicant in a data processing system, must an employer capture and retain the applicable applicant definition(s) - EEOC and OFCCP traditional, EEOC electronic, OFCCP electronic - under which that individual became a job applicant?

Please provide guidance on this possible requirement, since the internet applicant definitions proposed by the EEOC and the OFCCP differ.

Thank you for your consideration.

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